

PSJ4 SOL Opp Exh 56

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.  
Case No. 17-OP-45004

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al  
Case No. 18-OP-45132

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Videotaped deposition of
TERRY ALBANESE

January 4, 2019
9:04 a.m.

Taken at:
Sheraton Suites - Cuyahoga Falls
1989 Front Street
Cuyahoga Falls, Ohio

Renee L. Pellegrino, RPR, CLR

1 A. I don't know about the causes itself
2 of the epidemic, but that some people -- I
3 understand that some folks get addicted to drugs
4 through prescription abuse and others started
5 with street drugs.

6 Q. So when you say some folks get
7 addicted through prescriptions, do you mean they
8 first get addicted to prescription drugs and
9 then transition to something else?

10 A. That's the way I understand it.

11 Q. And how did you develop that
12 understanding?

13 A. Through the -- what we were hearing
14 from families, from the opiate task force. You
15 hear a lot from people in the community. Even
16 initially from people outside of Akron, in
17 Summit County, who it seems like they were the
18 first to demand action from the mayor, even
19 though it wasn't their mayor. But after a
20 while, the stories have a similar thread because
21 our initial understanding, like I told you
22 before, is that this was a street drug problem.
23 We didn't know how many people were addicted
24 until more and more people began to overdose.
25 So we learned a lot through those first couple

1 of years about the problem. And it was not what
2 I originally thought it was. But we knew that,
3 just thinking about growing up in the '70s, and
4 some of the '80s, who are younger, that that
5 small population of kids in high school who were
6 doing illegal drugs somehow didn't balloon into
7 these large numbers of addicts that we were
8 seeing in the 2000s and where did that come
9 from. You know, people don't just wake up in
10 their 40s and say, gee, I'm going to try heroin
11 for the first time. So we had to do the
12 research and really learn about why -- why we
13 were seeing this increase. It didn't make
14 sense.

15 Q. So what kind of -- so when you say
16 we had to do the research, who is the "we"?

17 A. I think any -- our community and our
18 city employees that are working in this, to try
19 to understand what was happening, to get the
20 information that would help us understand what
21 was happening. You don't begin to solve a
22 problem until you really understand the sources.

23 We went through this process -- and
24 I can speak easily about it with infant
25 mortality because that was my primary